UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA ON BEHALF OF ITS AGENCY)
SECRETARY OF U.S. DEPARTMENT OF HOUSING AND URBAN) Case No. 16-cv-9193
DEVELOPMENT,)
Plaintiff,) Judge: John J Tharp, Jr
v.)
) Magistrate Judge
WILLIAM P BUTCHER AS SPECIAL REPRESENTATIVE FOR) Susan E. Cox
VIVIAN R HARRELL a/k/a VIVIAN RITA DADE HARRELL)
(DECEASED); WALTER HARRELL; UNKNOWN HEIRS AND)
LEGATEES OF VIVIAN R HARRELL A/K/A VIVIAN RITA DADE)
HARRELL; UNKNOWN OWNERS AND NON-RECORD CLAIMANTS;)
Defendants.)

MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE

NOW COMES, Plaintiff, UNITED STATES OF AMERICA, ON BEHALF OF ITS AGENCY, SECRETARY OF U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, by and through its attorneys, Potestivo & Associates, P.C., and moves this Honorable Court, for the Entry of a Judgment of Foreclosure.

Plaintiff's claim of damages is for a sum that is made certain by computation and is more specifically set forth in its supporting Judgment Affidavit. (*See* Exhibit A, Affidavit of Amounts Due and Owing; *see* Exhibit B, Certificate of Prove-up of Foreclosure Fees and Costs).

WHEREFORE, the Plaintiff, UNITED STATES OF AMERICA ON BEHALF OF ITS AGENCY SECRETARY OF U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, moves this Honorable Court for entry of a Judgment of Foreclosure, and for that amount as set forth and made certain in its Judgment Affidavit and Certificate of Prove-up of Foreclosure Fees and Costs.

Respectfully submitted,

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